

ORIGINAL

04-0361

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CHIEF CLERK'S OFFICE

As a CLEC seeking to offer competitive local exchange service through the lease of unbundled network elements from incumbent carriers (“UNE-P”), Applicant TransWorld Network Corp. (“TWN”) respectfully seeks a waiver of Part 710 USOA requirements. TWN currently maintains a single set of books and records according

to Generally Accepted Accounting Principles ("GAAP"). TWN submits that USOA, designed for ILECs in a rate-base rate-of-return environment, is unnecessary for small CLECs, and that GAAP provides adequate detail for oversight and comparison of telecommunications providers.

TWN also seeks a waiver of Part 735, Section 735.180 (Directories), inasmuch as TWN intends to contract with the underlying incumbent LECs for the provision of directory listings for its customers. TWN understands that, if such arrangements are not effectuated, it is responsible for the provision of directory publications.

4. For all applicants requesting local exchange authority under Section 13-404 or Section 13-405, please complete the following:

- (a) the Standard Questions for Applicants Seeking Local Exchange Service Authority found in Appendix A of this document **Attached**
- (b) the 9-1-1 Questions for Applicants Seeking Local Exchange Service Authority found in Appendix B of this document; **Attached**
- (c) the Financial Questions for Applicants Seeking Local Exchange Service Authority found in Appendix C of this document; and **Attached**
- (d) if applicable, the Prepaid Service Questions for Applicants Seeking Local Exchange Service Authority found in Appendix D of this document. **Not Applicable**

5. In what area of the state does the Applicant propose to provide service?

Statewide, initially in all exchanges served by SBC/Ameritech and Verizon.

6. Please attach a sheet designating contact persons to work with Staff on the following:

- a) issues related to processing this application
- b) consumer issues
- c) customer complaint resolution
- d) technical and service quality issues
- e) "tariff" and pricing issues
- f) 9-1-1 issues
- g) security/law enforcement

Please identify each contact person's (i) name, (ii) title, (iii) mailing address, (iv) telephone number, (v) facsimile number, and (vi) e-mail address.

See Exhibit 1

7. Please check type of organization?

☐ Individual

☐ Partnership

☐ Other (Specify)

☒ Corporation

Date corporation was formed **December 1988**

In what state? **Minnesota**

8. Submit a copy of articles of incorporation and a copy of certificate of authority to transact business in Illinois.

See Exhibit 2

9. List jurisdictions in which Applicant is offering service(s).

TWN provides resold interexchange service in 36 states:

ALABAMA	KANSAS	NEW HAMPSHIRE	SOUTH CAROLINA
CALIFORNIA	LOUISIANA	NEW JERSEY	TENNESSEE
COLORADO	MARYLAND	NEW MEXICO	TEXAS
DC	MASSACHUSETTS	NEW YORK	UTAH
FLORIDA	MICHIGAN	NORTH CAROLINA	VERMONT
GEORGIA	MINNESOTA	NORTH DAKOTA	VIRGINIA
ILLINOIS	MISSOURI	OKLAHOMA	WASHINGTON
INDIANA	MONTANA	OREGON	WISCONSIN
IOWA	NEVADA	PENNSYLVANIA	WYOMING

TWN has been granted CLEC Authority (facilities-based or resale) in INDIANA, MICHIGAN and MINNESOTA

Intrastate resale authority for Illinois was granted in Docket No. 93-0152.

10. Has the Applicant, or any principal in Applicant, been denied a Certificate of Service or had its certification revoked or suspended in any jurisdiction in this or another name?

☒ YES (Please provide details) ☐ NO

TWN experienced heavy staff turnover in its Regulatory & Compliance during its 1999 and 2000 fiscal years. This turnover resulted in non-filing of reports for Arizona and Wisconsin. This resulted in administrative revocation of the company's Certificates of Public Convenience & Necessity in these states. TWN has since corrected the situation and has received new certification in Wisconsin, and has an application pending in Arizona.

11. Have there been any complaints or judgments levied against the Applicant in any other jurisdiction?

☒ YES ☐ NO

If YES, describe fully.

As a nationwide interexchange reseller, a small number of complaints (19) have been filed and resolved without penalty to TWN since 2000. Those complaints are summarized in Exhibit 3. No complaints have been filed before the ICC.

12. Has Applicant provided service under any other name?

☒ YES ☐ NO

If YES, please list.

TWN has provided services exclusively under its current name since April 1999. In 1997-1998, the company operated under the name of London Telecom Network, Corp. From 1988-1997, it operated under the name of Strategic Alliances, Inc. See Exhibit 2.

13. Will the Applicant keep its books and records in Illinois? ☐ YES ☒ NO

If NO, permission pursuant to 83 Ill. Adm Code Part 250 needs to be requested.

TWN respectfully seeks permission pursuant to 83 Ill. Adm Code Part 250, § 250.20 to continue to maintain its books and records at its national headquarters in Tampa,

Florida. If it should be necessary for the Commission to have access to TWN's books and records, TWN will promptly facilitate such access at its own expense.

MANAGERIAL

14. Please attach evidence of the applicant's managerial and technical resources and ability to provide service. This may be in either narrative form, resumes of key personnel, or a combination of these forms.

See Exhibit 4

15. List officers of Applicant.

Colin Wood	Chief Executive Officer
John Rakoczy	President
James Gardiner	Vice President-Technology Services
Terry Howett	Vice President-Sales & Marketing

16. Does any officer of Applicant have an ownership or other interest in any other entity which has provided or is currently providing telecommunications services? ☐ YES ☒ NO

If YES, list entity. _____

17. How will Applicant bill for its service(s)? (At a minimum, describe how often the Applicant will bill for service and details of the billing statement.)

TWN will bill its customers directly. Subscriber invoices are generated monthly in a manner consistent with applicable state and federal law and standard commercial billing practices. A sample invoice is attached as Exhibit 5.

18. How does Applicant propose to handle service, billing, and repair complaints? (At a minimum, describe Applicant's internal process for complaint resolution, the complaint escalation process, the timeframe and process by which the customer is notified by Applicant that they may seek assistance from the Commission?)

TWN is responsible for handling all customer inquiries and complaints via its toll-free customer service number, (800) 950-3015, which is provided by TWN on its customer bills. Customer service is available seven days a week, 24 hours a day. Customer service personnel are trained to efficiently and effectively process customer inquiries and requests via the company's proprietary software systems. TWN also provides personnel with an online customer service policy, procedure and reference manual for use in responding to customer inquiries and requests in a uniform, accurate and consistent manner. Customer service representatives also participate in role-playing sessions, listen to calls, and are monitored and mentored to ensure that representatives are following the Company's policies and procedures in a manner consistent with TWN's expected levels of performance, consistency, and accuracy in processing customer inquiries and complaints.

Customer service representatives will try to resolve inquiries immediately; however, if they are unable to do so, the customer will be informed that the company will investigate the matter as expeditiously as possible and that the customer will be advised of the outcome. If the customer remains dissatisfied, s/he will be advised that s/he may seek assistance from the ICC.

19. Will personnel be available at Applicant's business office during regular working hours to respond to inquiries about service or billing? X YES NO

20. What telephone number(s) would a customer use to contact your company?

(800) 950-3015

21. Will Applicant abide by all Federal and State slamming and cramming laws pursuant to Section 13-902 of the Public Utilities Act and Section 258 of the 1996 Telecommunications Act?

 X YES NO

22. Please describe applicant's procedures to prevent slamming and cramming of customers?

In addition to the customer service procedures and training described above, to prevent slamming a customer's phone line, TWN customer service representatives are trained to adhere to strict signup procedures to prevent slamming. Sales are not entered for processing until a valid third party voice verification or a signed customer agreement/LOA is received. Representatives are also trained to verify phone numbers with the customer at the time of signup. Further, TWN has a firm anti-cramming policy, and does not permit unauthorized or non-TWN services to be placed on its bills.

23. If granted authority to operate as a local exchange carrier, will the applicant abide by the following 83 Illinois Administrative Code Parts: 705, 710, 720, 725, 730, 732, 735, 755, 756, 757, 770, and 772?

 X YES NO (If no, please provide an explanation.)

24. Is Applicant aware that it must file tariffs prior to providing service in Illinois?

 X YES NO

FINANCIAL

25. Please attach evidence of Applicant's financial fitness through the submission of its most current income statement and balance sheet, or other appropriate documentation of applicant's financial resources and ability to provide service.

See Exhibit 6

TECHNICAL

26. Does Applicant utilize its own equipment and/or facilities? YES X NO

If YES, please list the facilities Applicant intends to utilize. Also include evidence that Applicant possesses the necessary technical resources to deploy and maintain said facilities:

If NO, which facility provider(s)'s services does the Applicant intend to use?

TWN proposes to provide competitive local exchange service in Illinois as both a facilities-based carrier, initially by virtue of the lease of the platform of unbundled network elements from the incumbent local carriers (UNE-P) and as a reseller of the ILECs' services. TWN will rely on the underlying ILECs for the operation and maintenance of the local exchange network. TWN will provide services using UNE-P and ILEC resale pursuant to interconnection agreements that TWN will file with the Commission in accordance with 47 U.S.C. § 252 and applicable rules. TWN may establish facilities in the future, and/or may acquire services and facilities from other carriers operating in Illinois.

27. Please describe the nature of service to be provided (e.g., operator services, internet, debit cards, long distance service, data services, local service, prepaid local service).

TWN intends to provide UNE-based and/or resold local exchange services to business and residential customers in Illinois. These services include two-way local lines/trunks, Centrex, ISDN and other high-capacity switched access services. TWN also proposes to provide associated local calling (usage) for these access lines, including message rate service for business customers and all required calling options for residential customers, and free 900 prefix call blocking. TWN will offer residential service, operator assistance services, directory assistance, and 9-1-1 emergency services. It will also continue to offer intraLATA and interLATA toll service, dedicated access telecommunication service, toll-free services, pre-paid and post-paid calling cards, dial-up Internet service and e-commerce value added services.

28. Will technical personnel be available at all times to assist customers with service problems?

 X YES NO

29. If Applicant intends to provide payphone service, will the equipment utilized comply with FCC requirements and Finding (9) of the Commission Order entered in Docket No. 84-0442 on June 11, 1986, including, but not limited to: (a) touch dialing; (b) access to 9-1-1 and "0" operator dialing without use of a coin; (c) rules governing use of payphones by disabled persons; (d) ability to complete local and long-distance calls; (e) unlimited duration for local calls; and (f) a message explaining the telephone's general operations, dialing instructions for emergency assistance, payphone owner's name, method of reporting service problems and method of receiving credit for faulty calls? YES NO

Not Applicable



Colin Wood
Chief Executive Officer
TransWorld Network Corp.

VERIFICATION

This application shall be verified under oath.

OATH

State of Florida

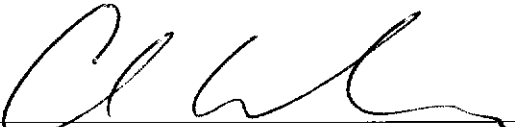
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County of Hillsborough

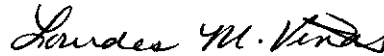
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Colin Wood makes oath and says that he is Chief Executive Officer of TransWorld Network, Corp; that he has examined the foregoing application and that to the best of his knowledge, information, and belief, all statements of fact contained in the said application are true, and the said application is a correct statement of the business and affairs of the above-named applicant in respect to each and every matter set forth therein.


(Signature of affiant)

Subscribed and sworn to before me, a Notary Public in the State and County above named, this 23rd day of April, 2004. Colin Wood is personally known to me.





(Signature of person authorized to administer oath)

My Commission expires: 04/07/2008

LIST OF EXHIBITS

- Exhibit 1: TWN Contact Persons
- Exhibit 2: Articles of Incorporation and Illinois Certificate of Authority to Transact Business
- Exhibit 3: Complaint History
- Exhibit 4: Managerial and Technical Qualifications
- Exhibit 5: TWN Sample Illinois Bill (Long Distance)
- Exhibit 6: Financial Qualifications and Chart of Accounts **[FILED
SIMULTANEOUSLY UNDER SEAL PURSUANT TO REQUEST
FOR CONFIDENTIAL TREATMENT]**
- Exhibit 7: TWN UTAC and ITAC Applications
- Exhibit 8: Prefiled Direct Testimony of Colin Wood